

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: MICHAEL LEON BROCK
Debtor

CHAPTER 11
CASE NO. 19-10293-JDW

APPLICATION TO EMPLOY SPECIAL COUNSEL

COMES NOW Michael Leon Brock (the “Debtor”) and files this his Application to Employ Special Counsel, and in support thereof, would show unto this Honorable Court the following, to-wit:

1. On January 22, 2019, the Debtor herein filed with this Court his Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code (the “Petition”).

2. This Honorable Court has jurisdiction of the subject matter herein and the parties hereto pursuant to 28 U.S.C. §§ 157 and 1334; 11 U.S.C. §§ 105, 364, 541, 1107 and related statutes, rules and various orders of reference. This is a core proceeding.

3. In order to facilitate the prudent performance of his duties and the successful operation of his affairs under this Chapter 11 proceeding, the Debtor requires the services of Tracy B. Walsh, Walsh Law Firm, PLLC (the “Law Firm”) of 6831 Crumpler Blvd., Suite 200, Olive Branch, Mississippi 38654-1933, to act as his special counsel in a custody and contempt action and to pursue a contempt and modification action on behalf of Regina Brock (“Ms. Brock”), the wife of the Debtor, which are more particularly described in the engagement letter, along with an itemized ledger of all services rendered and fees paid, which is attached hereto as **Exhibit “A”** and is incorporated by reference.

4. The Law Firm is experienced in, and is familiar with, the claims and is fully qualified to represent the interests of the Debtor therein.

5. The Debtor is informed and believes that the Law Firm has the appropriate skills and

expertise needed to serve as the Debtor's special counsel in the contested matters. The Law Firm has agreed to perform these services for the following rates: Tracy B. Walsh - \$300/hour; Paralegals - \$150/hour.

6. As set forth in the Affidavit of Tracy B. Walsh, attached hereto as Exhibit "B" and incorporated herein by reference, both Ms. Walsh and the Law Firm are "disinterested persons" as contemplated by the applicable statutory authority under which they are to be employed and applicable Bankruptcy Rules.

7. The Debtor has discussed with Ms. Walsh her availability to be employed as the Debtor's special counsel and to perform the services required by this estate. For the foregoing and all other necessary and proper purposes, the Debtor desires to retain the Law Firm as his special counsel.

8. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, the Debtor requests that he be authorized to employ Tracy B. Walsh and Walsh Law Firm, PLLC as his special counsel to render services described herein, effective December 16, 2019. The Debtor prays general relief.

THIS, the 29th day of July, 2021.

Respectfully submitted,

MICHAEL LEON BROCK

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: /s/ Craig M. Geno
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Sammye S. Tharp, Esq.
Office of the United States Trustee
sammye.s.tharp@usdoj.gov

THIS, the 29th day of July, 2021.

/s/ Craig M. Geno

Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: MICHAEL LEON BROCK
Debtor

CHAPTER 11
CASE NO. 19-10293-JDW

EXHIBIT “A”

July 15, 2021

Craig Geno
Attorney at Law
587 Highland Colony Pkwy.
Ridgeland, MS 39157

Re: Michael and Regina Brock
Desoto County Chancery Court Action 19-cv-1906

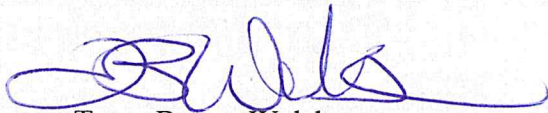
Dear Craig:

My office was retained by the Brocks in December 2019 to defend Ms. Brock in a custody and contempt action and to pursue a contempt and modification action on her behalf.

Although we have had a final trial on the case, all of the issues have not been adjudicated and there is a motion set in August and a report back date set in November. The fees for my services are \$300 per hour for my time and \$150 per hour for paralegal time. To date, the Brocks have paid \$12,260.00, with a current outstanding balance of \$900.00. An itemized ledger of all services and fees is attached hereto.

Please let me know if you have any questions or need any additional information.

Sincerely:



Tracy Buster Walsh
Attorney at Law

cc: Mr. And Mrs. Michael Brock

Tracy Buster Walsh
6831 Crumpler Blvd. / Suite 200
Olive Branch, MS 38654
(662) 890-3086 / (662) 253-5161
Fax (866) 475-5589
Email: tbwalsh@walshlawfirmpllc.com

Date	Received From/Paid To	Chq#	General	Bld	Trust	Activity	
Entry #	Explanation	Rec#	Rcpts Disbs	Inv# Acc	Rcpts	Disbs	Balance
BrockR Brock, Regina							
12156-08	Brock v McCain						Resp Lawyer: TBW
Dec 16/2019	Lawyer: TBW 0.00 Hrs X 300.00						
130006	Legal fee to open file			500.00	31880		
	(Consultation applied)						
Dec 16/2019	Lawyer: TBW 0.40 Hrs X 150.00						
130287	Draft Entry of Appearance			60.00	31880		
Dec 16/2019	Regina Brock						
130444	legal fees	3575		31880	1	4720.00	4720.00
Dec 16/2019	Regina Brock						
130446	legal fees	3576		31880	1	275.00	4995.00
Dec 17/2019	Lawyer: TBW 2.40 Hrs X 300.00						
130291	Appearance at hearing			720.00	31880		
Dec 23/2019	Lawyer: TBW 0.40 Hrs X 300.00						
130387	Correspondence with A. Moore			120.00	31880		
Jan 2/2020	Billing on Invoice 31880						
130557	FEES 1400.00		0.00	31880			
Jan 2/2020	Walsh Law Firm General Account						
130981	legal fees	2340		31949	1	1400.00	3595.00
Jan 2/2020	Regina Brock						
131005	PMT - legal fees	09936	1400.00				
Jan 9/2020	Lawyer: TBW 1.20 Hrs X 300.00						
130828	Review file; Office conference with client; Telephone conference with Mike; Correspondence with opposing counsel (DHS)			360.00	31949		
Jan 23/2020	Lawyer: TBW 0.30 Hrs X 300.00						
131316	Correspondence with opposing counsel; Correspondence with client			90.00	31949		
Feb 2/2020	Walsh Law Firm General Account						
131843	legal fees	ad		32218	1	450.00	3145.00
Feb 2/2020	Regina Brock						
131870	PMT - legal fees	09994	450.00				
Feb 3/2020	Billing on Invoice 31949						
131532	FEES 450.00		0.00	31949			
Feb 5/2020	Lawyer: TBW 0.30 Hrs X 300.00						
131649	Correspondence with opposing counsel; Correspondence with client			90.00	32218		
Feb 7/2020	Lawyer: TBW 0.50 Hrs X 300.00						
131721	Review Order; Correspondence with client; Correspondence with opposing counsel			150.00	32218		
Feb 10/2020	Lawyer: TBW 0.90 Hrs X 300.00						
131729	Correspondence with client; Telephone conference with client; Correspondence with opposing counsel; Correspondence with Court Administrator			270.00	32218		
Feb 11/2020	Lawyer: TBW 1.00 Hrs X 150.00						
131777	Draft Answer and Counter-Claim; Correspondence with client			150.00	32218		
Feb 11/2020	Lawyer: TBW 0.40 Hrs X 300.00						
131781	Correspondence with opposing counsel; Correspondence with client			120.00	32218		
Feb 12/2020	Lawyer: TBW 0.30 Hrs X 300.00						
131784	Telephone conference with M Brock; Correspondence with opposing counsel			90.00	32218		
Feb 12/2020	Lawyer: TBW 0.30 Hrs X 150.00						
131805	Correspondence with client; Draft Answer and Counter-Claim; Office conference with client			45.00	32218		
Feb 14/2020	Lawyer: TBW 0.70 Hrs X 300.00						
131825	Review and revise Answer and Counter-Claim; file same; Correspondence with client			210.00	32218		
Feb 20/2020	Lawyer: TBW 0.50 Hrs X 150.00						
132202	Correspondence with client' Draft Summons			75.00	32218		
Feb 21/2020	Lawyer: TBW 0.20 Hrs X 150.00						
132225	Telephone conference with client			30.00	32218		
Mar 2/2020	Billing on Invoice 32218						
132629	FEES 1230.00		0.00	32218			
Mar 2/2020	Lawyer: TBW 0.20 Hrs X 150.00						
134731	Correspondence with client			30.00	34438		
Mar 2/2020	Walsh Law Firm General Account						
134875	legal fees	ad		34438	1	1230.00	1915.00
Mar 2/2020	Regina Brock						
134910	PMT - legal fees	10066	1230.00				
Mar 16/2020	Lawyer: TBW 0.20 Hrs X 150.00						
135237	Telephone conference with client			30.00	34438		
Mar 17/2020	Lawyer: TBW 0.20 Hrs X 300.00						
135250	Correspondence with opposing counsel			60.00	34438		
Mar 19/2020	Lawyer: TBW 0.30 Hrs X 150.00						

Date	Received From/Paid To	Chq#	General	Bld	Trust	Activity	
Entry #	Explanation	Rec#	Rcpts Disbs	Inv#	Acc	Rcpts Disbs	Balance
135111	Draft Order of Continuance			45.00	34438		
Mar 19/2020	Lawyer: TBW 0.40 Hrs X 300.00						
135294	Telephone conference with opposing counsel; Correspondence with Court Administrator			120.00	34438		
Mar 20/2020	Lawyer: TBW 0.20 Hrs X 150.00						
135125	Correspondence with client			30.00	34438		
Mar 23/2020	Lawyer: TBW 0.20 Hrs X 300.00						
135295	Correspondence with opposing counsel			60.00	34438		
Mar 23/2020	Lawyer: TBW 1.00 Hrs X 150.00						
135311	Draft Financial Disclosure; Correspondence with client			150.00	34438		
Mar 24/2020	Lawyer: TBW 0.50 Hrs X 150.00						
135332	Draft Financial Disclosure; Correspondence with client			75.00	34438		
Mar 26/2020	Lawyer: TBW 0.40 Hrs X 300.00						
135415	Review Financial Disclosure (TBW)			120.00	34438		
Mar 27/2020	Lawyer: TBW 0.20 Hrs X 150.00						
135440	Revise Financial Disclosure			30.00	34438		
Apr 1/2020	Billing on Invoice 34438						
135750	FEES 750.00		0.00		34438		
Apr 1/2020	Lawyer: TBW 0.20 Hrs X 150.00						
137864	Telephone conference with client			30.00	36470		
Apr 1/2020	Walsh Law Firm General Account legal fees	ad		36470	1	750.00	1165.00
Apr 1/2020	Regina Brock PMT - legal fees	10137	750.00				
Apr 2/2020	Lawyer: TBW 0.30 Hrs X 300.00						
137868	Correspondence with opposing counsel; Correspondence with client			90.00	36470		
Apr 29/2020	Lawyer: TBW 0.20 Hrs X 150.00						
138638	Correspondence with client			30.00	36470		
Apr 29/2020	Billing on Invoice 36470						
138727	FEES 150.00		0.00		36470		
May 1/2020	Walsh Law Firm General Account legal fees	ad		36640	1	150.00	1015.00
May 1/2020	Regina Brock PMT - legal fees	10209	150.00				
May 20/2020	Lawyer: TBW 0.20 Hrs X 150.00						
139470	Telephone conference with client			30.00	36640		
May 29/2020	Lawyer: TBW 0.20 Hrs X 150.00						
139686	Correspondence with client			30.00	36640		
Jun 1/2020	Billing on Invoice 36640						
139718	FEES 60.00		0.00		36640		
Jun 1/2020	Lawyer: TBW 0.20 Hrs X 150.00						
139914	Correspondence with client			30.00	36814		
Jun 1/2020	Walsh Law Firm General Account legal fees	d		36814	1	60.00	955.00
Jun 1/2020	Regina Brock PMT - legal fees	10267	60.00				
Jun 2/2020	Lawyer: TBW 1.00 Hrs X 150.00						
139937	Draft discovery requests, Notice & COS			150.00	36814		
Jun 3/2020	Lawyer: TBW 0.30 Hrs X 150.00						
140001	Revise discovery requests and Notice & COS			45.00	36814		
Jun 3/2020	Lawyer: TBW 0.40 Hrs X 300.00						
140005	Review discovery requests (TBW)			120.00	36814		
Jun 4/2020	Lawyer: TBW 0.30 Hrs X 300.00						
140015	Correspondence with opposing counsel; Correspondence with client; File Notice & COS			90.00	36814		
Jun 30/2020	Billing on Invoice 36814						
140778	FEES 435.00		0.00		36814		
Jul 1/2020	Walsh Law Firm General Account legal fees	ad		36983	1	435.00	520.00
Jul 1/2020	Regina Brock PMT - legal fees	10331	435.00				
Jul 15/2020	Lawyer: TBW 0.20 Hrs X 300.00						
141489	Correspondence with opposing counsel re: discovery responses; Correspondence with client			60.00	36983		
Jul 23/2020	Lawyer: TBW 0.60 Hrs X 300.00						
141657	Review and file Motion to Compel; Correspondence with opposing counsel; Correspondence with client			180.00	36983		
Jul 23/2020	Lawyer: TBW 0.80 Hrs X 150.00						
141664	Draft Motion to Compel, Notice & COS; Correspondence with Court Administrator			120.00	36983		
Jul 28/2020	Lawyer: TBW 0.40 Hrs X 300.00						
141739	Correspondence with opposing counsel; Correspondence with client; Correspondence with D. Shrvati			120.00	36983		

Date	Received From/Paid To	Chq#	General	Bld	Trust	Activity	
Entry #	Explanation	Rec#	Disbs	Inv#	Acc	Disbs	Balance
Jul 30/2020	Lawyer: TBW 0.20 Hrs X 300.00						
141774	Correspondence with DHS;			60.00	36983		
Aug 3/2020	Billing on Invoice 36983						
141837	FEES 540.00		0.00	36983			
Aug 3/2020	Walsh Law Firm General Account						
142445	legal fees	ad		37148	1	520.00	0.00
Aug 3/2020	Regina Brock						
142475	PMT - legal fees	10440	520.00				
Aug 6/2020	Lawyer: TBW 0.70 Hrs X 150.00						
141990	Draft Affidavit			105.00	37148		
Aug 6/2020	Lawyer: TBW 0.30 Hrs X 150.00						
142720	Complete Affidavit for Legal Fees			45.00	37148		
Aug 10/2020	Lawyer: TBW 0.50 Hrs X 300.00						
142084	Correspondence with opposing counsel; Correspondence with client			150.00	37148		
Aug 11/2020	Lawyer: TBW 1.00 Hrs X 300.00						
141991	Appearance at hearing (estimated)			300.00	37148		
Aug 11/2020	Lawyer: TBW 1.50 Hrs X 300.00						
142111	Review Motion to Continue; Appearance at hearing			450.00	37148		
Aug 17/2020	Lawyer: TBW 0.30 Hrs X 150.00						
142248	Amend continuance order (NO CHARGE)			0.00	37148		
Sep 1/2020	Billing on Invoice 37148						
142772	FEES 1050.00		0.00	37148			
Sep 15/2020	Regina Brock						
143267	PMT - legal fees	10537	1070.00				
Sep 22/2020	Lawyer: TBW 1.80 Hrs X 300.00						
143419	Appearance at hearing; Draft Order; Correspondence with opposing counsel; Correspondence with client			540.00	37303		
Sep 28/2020	George Brandon McCain						
143478	RET - legal fees	10539	500.00		37303		
Sep 28/2020	Lawyer: TBW 0.20 Hrs X 300.00						
143544	Correspondence with opposing counsel; Correspondence with client			60.00	37303		
Sep 28/2020	Billing on Invoice 37303						
143640	FEES 750.00		0.00	37303			
	RCPTS 500.00						
Sep 28/2020	RET - Rtnr alloc on Inv: 37303	37303	-500.00		37303		
Sep 28/2020	RET - Rtnr alloc on Inv: 37303	37303	500.00		37303		
Sep 30/2020	Lawyer: TBW 1.00 Hrs X 150.00						
143601	Review discovery responses for completeness; Draft memo			150.00	37303		
Oct 26/2020	Lawyer: TBW 0.30 Hrs X 150.00						
144375	Draft re-notice of motion; Correspondence with Court Administrator			45.00	37458		
Oct 26/2020	Lawyer: TBW 0.70 Hrs X 300.00						
144382	Review discovery responses; Correspondence with opposing counsel; Correspondence with client			210.00	37458		
Nov 2/2020	Billing on Invoice 37458						
144474	FEES 255.00		0.00	37458			
Nov 5/2020	Regina Brock						
145017	PMT - legal fees	10611	505.00				
Nov 17/2020	Lawyer: TBW 2.00 Hrs X 300.00						
144863	Appearance at hearing; Draft Order			600.00	37613		
Nov 19/2020	Lawyer: TBW 0.30 Hrs X 300.00						
144891	Telephone conference with A. Moore			90.00	37613		
Nov 19/2020	Lawyer: TBW 0.20 Hrs X 150.00						
144940	Correspondence with client			30.00	37613		
Dec 1/2020	Billing on Invoice 37613						
145258	FEES 720.00		0.00	37613			
Dec 14/2020	Lawyer: TBW 0.50 Hrs X 300.00						
145559	Review file; Update affidavit			150.00	37764		
Dec 15/2020	Lawyer: TBW 0.20 Hrs X 150.00						
145856	Print discovery responses			30.00	37764		
Dec 15/2020	Lawyer: TBW 1.30 Hrs X 300.00						
145861	Appearance at hearing; Correspondence with client			390.00	37764		
Dec 31/2020	Regina Brock						
145959	PMT - legal fees	10723	720.00				
Jan 4/2021	Billing on Invoice 37764						
146038	FEES 570.00		0.00	37764			
Feb 1/2021	Billing on Invoice 37909						
147046			0.00	37909			
Feb 4/2021	Lawyer: TBW 1.30 Hrs X 300.00						
147294	Review discovery responses; Prepare for trial:			390.00	38060		

Date	Received From/Paid To	Chg#	General	Bld	Trust	Activity	
Entry #	Explanation	Rec#	Rcpts Disbs	Inv# Acc	Rcpts Disbs	Balance	
	Correspondence with opposing counsel; Office conference with client; Correspondence with DHS						
Feb 10/2021	Lawyer: TBW 0.30 Hrs X 150.00						
147604	prepare exhibit			45.00	38060		
Mar 1/2021	Billing on Invoice 38060						
147842	FEES 435.00		0.00		38060		
Mar 9/2021	Lawyer: TBW 0.50 Hrs X 150.00						
148050	Draft Affidavit Contempt			75.00	38207		
Mar 10/2021	Lawyer: TBW 1.50 Hrs X 300.00						
148051	Prepare for trial; complete affidavit			450.00	38207		
Mar 11/2021	Lawyer: TBW 0.50 Hrs X 0.00						
148207	Correspondence with opposing counsel; Correspondence with client; Telephone conference with client (NO CHARGE)			0.00	38207		
Mar 11/2021	Regina Brock						
148370	PMT - legal fees	10852	1005.00				
Mar 12/2021	Lawyer: TBW 4.00 Hrs X 300.00						
148756	Appearance at Trial			1200.00	38207		
Mar 15/2021	Lawyer: TBW 1.00 Hrs X 300.00						
148227	Telephone conference with client; Draft Judgment; Correspondence with DHS; Correspondence with opposing counsel			300.00	38207		
Mar 16/2021	Lawyer: TBW 2.20 Hrs X 300.00						
148243	Draft Findings of Fact			660.00	38207		
Mar 17/2021	Lawyer: TBW 0.30 Hrs X 300.00						
148263	Correspondence with opposing counsel re: Judgment			90.00	38207		
Mar 22/2021	Lawyer: TBW 0.30 Hrs X 300.00						
148495	Correspondence with Court Administrator; Correspondence with opposing counsel; Correspondence with DHS			90.00	38207		
Mar 25/2021	Lawyer: TBW 0.20 Hrs X 150.00						
148646	Correspondence with Court Administrator			30.00	38207		
Apr 1/2021	Billing on Invoice 38207						
148772	FEES 2895.00		0.00		38207		
Apr 28/2021	Regina Brock						
149189	PMT - legal fees	10937	2895.00				
May 3/2021	Billing on Invoice 38354						
149630			0.00		38354		
May 3/2021	Lawyer: TBW 1.50 Hrs X 300.00						
149838	Appearance at hearing			450.00	38498		
May 10/2021	Lawyer: TBW 0.20 Hrs X 300.00						
149945	Correspondence with opposing counsel (DHS)			60.00	38498		
May 11/2021	Lawyer: TBW 0.20 Hrs X 300.00						
149963	Correspondence with Court Administrator			60.00	38498		
Jun 1/2021	Billing on Invoice 38498						
150551	FEES 570.00		0.00		38498		
Jun 1/2021	Billing on Invoice 38638						
150693			0.00		38638		
Jun 9/2021	Regina Brock						
151487	PMT - legal fees	11061	570.00				
Jun 10/2021	Lawyer: TBW 0.30 Hrs X 300.00						
150897	Correspondence with DHS; Correspondence with client			90.00	39002		
Jun 11/2021	Lawyer: TBW 0.30 Hrs X 300.00						
150898	Review info from DHS. Correspondence with client			90.00	39002		
Jun 14/2021	Lawyer: TBW 2.00 Hrs X 300.00						
150899	Draft affidavit; Appearance at hearing			600.00	39002		
Jun 29/2021	Billing on Invoice 39002						
151845	FEES 900.00		0.00		39002		
Jun 30/2021	Lawyer: TBW 0.40 Hrs X 300.00						
151590	Review Order; Correspondence with client			120.00	39002		
Jul 1/2021	Lawyer: TBW 0.20 Hrs X 0.00						
154267	Correspondence with client (NO CHARGE)			0.00			
Jul 7/2021	Lawyer: TBW 0.90 Hrs X 300.00						
154327	Draft Motion, COS and Notice; file same; Correspondence with Court Administrator; Correspondence with client			270.00			

TOTALS	CHE	+	RECOV	+	FEES	=	TOTAL	DISBS	+	FEES	+	TAX	-	RECEIPTS	=	A/R	TRUST
PERIOD	0.00		0.00		270.00		270.00	0.00		13160.00		0.00		12260.00		900.00	0.00

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NORTHERN DISTRICT OF MISSISSIPPI**

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Debtor

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Debtor

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AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Tracy B. Walsh (the "Affiant") of Walsh Law Firm, PLLC (the "Law Firm") of 6831 Crumpler Blvd., Suite 200, Olive Branch, Mississippi 38654-1933, who after having been by me first duly sworn, stated on oath that this Affidavit is submitted in support of the *Application to Employ Special Counsel* (the "Application"), that the Affiant represents no interests adverse to the Debtor or the estate and matters upon which she is to be engaged, and her employment would be in the best interest of this estate. To the best of Affiant's knowledge, she has no connection with the Debtor, the creditors herein, other than as described above, with any other party-in-interest or their respective attorneys and accountants, or with the office of the U. S. Trustee, or its employees, which are prohibited, which would interfere with or hinder the performance of the Affiant's duties herein, or which need to be described herein.


The Affiant hereby makes application for employment as special counsel to the Debtor.


Tracy B. Walsh

STATE OF MISSISSIPPI
COUNTY OF Desoto

SWORN TO AND SUBSCRIBED BEFORE ME, this the 29th day of July, 2021.




NOTARY PUBLIC